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10 Attorneys for Defendant,  
11 Battle Born Home Health, LLC.,  
12 and Jessica Conant  
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16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

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20 MISSION HEALTHCARE SERVICES, LLC, a  
21 California limited liability company; and  
22 HEALTHY LIVING AT HOME-CARSON CITY  
23 LLC, a Nevada Limited Liability Company

24  
25 Plaintiffs,

26 vs.

27 BATTLE BORN HOME HEALTH, LLC, a  
28 Nevada limited liability company; JESSICA  
29 CONNANT (CRISP), an individual; ANGEL  
30 VASQUEZ BARNES, an individual; and  
31 JOSEPH BARNES, an individual,

32  
33 Defendants.

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35 **Case No. 3:22-cv-00333-LRH-CLB**  
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**ORDER GRANTING**

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38 **STIPULATION TO EXTEND DEADLINE TO**  
39 **PRODUCE RULE 26(F) INITIAL**  
40 **DISCLOSURES AND DEFENDANTS'**  
41 **RESPONSE TO PLAINTIFFS' FIRST SET**  
42 **OF REQUESTS FOR PRODUCTION OF**  
43 **DOCUMENTS AND FIRST SET OF**  
44 **INTERROGATORIES**

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**STIPULATION**

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48 Plaintiffs MISSION HEALTHCARE SERVICES, LLC and HEALTHY LIVING AT  
49 HOME – CARSON CITY, LLC, (“Plaintiffs”) and Defendants ANGEL VASQUEZ BARNES and  
50 JOSEPH BARNES (together, the “Barnes”), and Defendants JESSICA CONNANT (CRISP)

51 ALLISON MacKENZIE, LTD.  
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1 ("Connant") and BATTLE BORN HOME HEALTH, LLC ("Battle Born," and together  
2 with Plaintiffs, Connant, and the Barnes, the "Parties"), by and through their respective  
3 counsel of record, hereby stipulate and agree as follows.

4 1. Plaintiffs submitted their First Set of Requests for Production of Documents and First  
5 Set of Interrogatories to each Defendant on October 21, 2022.

6 2. The Parties filed the Case Management Report on November 18, 2022, setting the  
7 deadline for all Parties to make their Rule 26(f) Initial Disclosures no later than December 9, 2022, and  
8 for Defendants to respond to Plaintiffs' First Set of Requests for Production of Documents and First  
9 Set of Interrogatories no later than December 9, 2022.

10 3. Counsel have agreed to extend the deadline for all parties to provide their Rule 26(f)  
11 Initial Disclosures and for Defendants to respond to Plaintiffs' First Set of Requests for Production of  
12 Documents and First Set of Interrogatories, until and including December 16, 2022.

13 4. This is the Parties first request for an extension of time to submit Rule 26(f) Initial  
14 Disclosures.

15 5. This is Defendants first request for an extension of time to respond to Plaintiffs First Set  
16 of Requests for Production of Documents and First Set of Interrogatories.

17 6. This stipulation is made in good faith and not in an attempt to delay proceedings.

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1 Dated this 8th day of December, 2022.

2 /s/ Jeremy R. Reichenberg

3 John R. Funk, Esq. (NSB 12372)  
4 Jeremy R. Reichenberg, Esq. (NSB 10297)  
5 GUNDERSON LAW FIRM  
6 3895 Warren Way  
7 Reno, Nevada 89509

8 *Attorneys for Angel Vasquez Barnes and*  
9 *Joseph Barnes*

10 Dated this 8th day of December, 2022.

11 /s/ Kody L. Condos

12 Gregory M. Saylin, Esq. (Utah Bar No.  
13 9648) (Pro Hac Vice pending)  
14 Kody L. Condos, Esq. (Utah Bar No. 17186)  
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23 *Attorneys for Plaintiffs Mission Healthcare*  
24 *Services, LLC and Health Living at Home –*  
25 *Carson City, LLC*

26 Dated this 8th day of December, 2022.

27 /s/ Ryan D. Russell

28 Ryan D. Russell, Esq. (NSB 8646)  
29 ALLISON MACKENZIE, LTD.  
30 402 N. Division Street, P.O. Box 646  
31 Carson City, Nevada 89702

32 *Attorneys for Battle Born Home Health, LLC*  
33 *and Jessica Connant*

34 **ORDER**

35 **IT IS SO ORDERED.** All Parties shall have until and including December 16, 2022 to file  
36 their Initial Disclosures. Defendants shall have until and including December 16, 2022 to file with  
37 Responses to Plaintiffs' First Set of Requests for Production of Documents and First Set of  
38 Interrogatories.

39 DATED this 8th day of December, 2022.



40 UNITED STATES MAGISTRATE JUDGE

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